



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8EPR-N

MAY 26 2009

Robert J. Thompson, District Ranger
Black Hills National Forest
8221 South Highway 15
Rapid City, SD 57702

RE: Slate Castle Project Area, Mystic Ranger District,
Draft Environmental Impact Statement
CEQ# 20090106

Dear Mr. Thompson:

The Environmental Protection Agency (EPA) Region 8 Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Slate Castle Project Area on the Black Hills National Forest (BHNF). The EPA reviews EISs in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. The EPA's comments include a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

The primary management emphasis in the Slate Castle Project Area is to move toward achieving desired land and resource conditions; reduce the threat to ecosystem components, including forest resources, from the existing mountain pine beetle epidemic; and to help protect local communities and resources from large-scale wildfire by reducing hazardous fuels. The Forest Service seeks to maintain or improve forest health and vigor on a landscape scale to maintain a healthy forest that is less susceptible to forest insects and diseases, and can better withstand events such as wildfire, wind, snow, drought and other weather-related impacts.

The DEIS analyzes three alternatives including the No Action. Under the proposed action, Alternative B, about 35,600 acres of National Forest Service (NFS) lands are proposed for some type of mechanical treatment. Alternative B includes creation of fuel break corridors adjacent to private property boundaries, along main roads, and utility corridors. These fuel breaks are intended to moderate the effects of a wildfire moving onto or way from private land by providing a defensible line/space. This alternative also proposes approximately 35,600 acres of commercial and non-commercial thinning to remove mountain pine beetle (MPB) infested trees

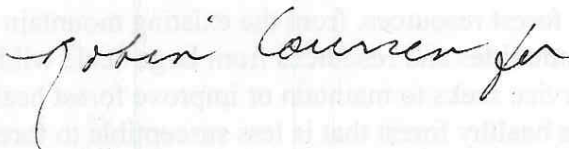
and reduce stand densities. Commercial thinning activities will emphasize thinning from above and retaining the larger diameter trees while meeting the insect and fire hazard reduction objectives.

In general, the DEIS provides a thorough analysis of the environmental impacts of the proposed alternatives, and the analysis is supported by useful maps. For additional clarity, EPA requests that the acronym CWD (coarse woody debris) be added to the Commonly Used Acronyms and Abbreviations page. EPA believes that Alternative C is the environmentally preferable alternative. Alternative C reduces the overall mechanical treatment acres compared to Alternative B, especially within Management Area 5.4, Big Game Winter Range. Alternative C is also responsive to public concerns about the amount of treatment in Structural Stages 4B and 4C, and the public's desire to retain large trees. EPA also supports Alternative C's proposal that mechanical treatments be limited to those areas near private property and the reduced amount of new road construction and the environmental impacts of that activity. EPA notes that no roads are proposed for decommissioning with this project. With a total open road density of roads on forest land within the Slate Castle Project Area of 3.9 miles per square mile, and considering that many roads do not meet maintenance standards (DEIS page 68), EPA strongly recommends the NFS use the existing transportation network, and minimize or avoid new road construction.

EPA evaluates the potential effects of proposed actions and the adequacy of the information in the DEIS. We rate this DEIS an "EC-1" (environmental concerns, sufficient information) under EPA's enclosed ratings criteria. The EC rating indicates that the reviewer has identified environmental impacts that should be avoided in order to adequately protect the environment. A copy of EPA's rating criteria is attached.

EPA appreciates the opportunity to review and comment on the DEIS and your willingness to consider our comments at this stage of your planning process. If we may provide further explanation of our concerns please contact Jody Ostendorf of my staff at 303 312-7814, or me at 303 312-6004.

Sincerely,



Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation

Enclosure:

Ratings criteria